

Exhibit G

Contesting Letter

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ROBERT FAVATA
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MAUREEN A. CARROLL

NEW YORK OFFICE:
228 EAST 45TH STREET
17TH FLOOR
NEW YORK, N.Y. 10017

via overnight delivery and email

July 24, 2014

COMMONWEALTH LAND TITLE INSURANCE CO.

140 East 45th Street
New York, New York 10017
Attn: Ms. Grace Onaga, Vice President

**Re: Purchase Agreement between DAB Group, LLC as Seller and
Monty One, LLC as Purchaser
Title No.: NY130352**

Dear Ms. Onaga:

This firm represented the seller in connection with the above captioned transaction. I am in receipt of a copy of a letter from Steven M. Goldman, Esq. on behalf of the purchaser requesting a release of the escrow deposit of \$462,500.00.


Please note that the seller DAB Group, LLC has filed for protection under Chapter 11 of the Bankruptcy Code. I am herewith enclosing a copy of the notice of filing.

Accordingly, pursuant to Section 362 (a) of the Bankruptcy Code, all actions with respect to the debtor are "stayed".

Moreover, prior to the filing, the entitlement to this deposit was the subject of litigation in the Supreme Court, New York City.

Therefore, DAB Group LLC does not consent to the release of this deposit.

Very truly yours,
FAVATA & WALLACE, LLP


William G. Wallace

WGW/aa

enc.

cc: Steven M. Goldman, Esq.
DAB Group, LLC via email
Kevin Nash, Esq.

FILED: NEW YORK COUNTY CLERK 07/14/2014

NYSCEF DOC. NO. 861

INDEX NO. 850044/2011

RECEIVED NYSCEF: 07/14/2014

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
ORCHARD HOTEL LLC,

Index No. 850044/2011

Plaintiffs,

-against-

D.A.B. GROUP, LLC, et al.

Defendants.
-----X

NOTICE OF BANKRUPTCY FILING

PLEASE TAKE NOTICE that on July 14, 2014, D.A.B. Group, LLC (the "Debtor") filed a voluntary petition in the United States Bankruptcy Court for the Southern District of New York for relief under chapter 11 of the Bankruptcy Code. A copy of the notice of bankruptcy case filing is attached hereto as Exhibit "A".

PLEASE TAKE FURTHER NOTICE that pursuant to section 362(a) of the Bankruptcy Code, the Debtor's filing of its voluntary petition operates as a stay, applicable to all entities, of, among other things: (a) the commencement or continuation of all judicial, administrative, or other actions or proceedings against the Debtor (i) that were or could have been commenced before the commencement of the Debtor's case or (ii) to recover any claims against the Debtor that arose before the commencement of the Debtor's case; (b) the enforcement, against the Debtor or against any property of the Debtor's bankruptcy estates, of a judgment obtained before the commencement of the Debtor's cases; or (c) any act to obtain

possession of property of or from the Debtor's bankruptcy estate, or to exercise control over
property of the Debtor's bankruptcy estate.

Dated: New York, New York
July 14, 2014

GOLDBERG WEPRIN FINKEL
GOLDSTEIN LLP
Attorneys for the Defendant
1501 Broadway, 22nd Floor
New York, New York 10036

By: 

J. Ted Donovan, Esq.

TO: Morrison Cohen LLP
Attorneys for Plaintiff
909 Third Avenue
New York NY 10022

Simon J.K. Miller, Receiver
Blank Rome LLP
405 Lexington Avenue
New York, NY 10174